

IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JAY P. ACKERMAN : CASE NO. 1:20-bk-03076-HWV
BRENDA M. ACKERMAN :
Debtors :
ROCKET MORTGAGE, LLC, f/k/a QUICKEN : CHAPTER 13
LOANS, LLC, f/k/a QUICKEN LOANS, INC. :
Movant :
v. :
JAY P. ACKERMAN :
BRENDA M. ACKERMAN :
Respondents :

DEBTORS' RESPONSE TO MOTION OF ROCKET MORTGAGE, LLC,
f/k/a QUICKEN LOANS, LLC, f/k/a QUICKEN LOANS, INC.
FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW come Debtors, Jay P. Ackerman and Brenda M. Ackerman, by and through their attorney, Gary J. Imblum, and respectfully represent:

1. Admitted in part and denied in part. Debtors have no knowledge as to the Movant. Strict proof is demanded.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. Debtors have no knowledge as to the holder of the mortgage. Strict proof is demanded.
5. Admitted.
6. Admitted. Further, Debtors offer to cure the arrearage through an Amended Plan.
7. Admitted in part and denied in part. See response to paragraph 6.

8. Admitted in part and denied in part. Debtors have no knowledge as to the payoff of the loan. Strict proof is demanded.

9. Denied. The property at the time of the filing of the bankruptcy was worth \$173,000.00 in accordance with the market analysis. By Movant's own admission, the payoff of the loan is approximately \$134,000.00. Accordingly, there is a substantial equity cushion providing adequate protection to Movant. Further, Debtors are providing adequate protection through regular monthly payments. To the extent that the monthly payments are in arrears, Debtors will make an offer in the near future to bring same current.

10. Admitted in part and denied in part. Any and all fees and costs to be charged to the Movant should be disclosed in this proceeding and approved by the Court.

11. Admitted in part and denied in part. See response to paragraph 10.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying Rocket Mortgage, LLC, f/k/a Quicken Loans, LLC, f/k/a Quicken Loans, Inc. Motion for Relief From the Automatic Stay.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



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Attorney for Debtors

Dated: 1-10-25

CERTIFICATE OF SERVICE

I, Carol V. Shay, Paralegal, hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF ROCKET MORTGAGE, LLC, f/k/a QUICKEN LOANS, LLC, f/k/a QUICKEN LOANS, LLC FOR RELIEF FROM THE AUTOMATIC STAY on the following persons by E-Service, addressed to:

JACK ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

BRENT J. LEMON, ESQUIRE
KML LAW GROUP P.C.
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.

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For Debtors

Dated: 1/10/2025